



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

JAN 26 2001

Mr. Robert Petrancosta
Director
Safety and Environmental Compliance
Conway Transportation Services
110 Parkland Plaza
Ann Arbor, MI 48103

Ref. No. 00-0360

Dear Mr. Petrancosta:

This is in response to your December 22, 2000, letter regarding the identification number marking requirements for poisonous by inhalation (PIH) materials as specified in § 172.313(c) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you request guidance on determining which identification number to mark on a vehicle containing two different PIH materials in non-bulk packages in the same hazard zone with identical gross weights.

Section 172.313(c)(3)(i) requires a transport vehicle or freight container containing different PIH materials in non-bulk packages be marked with identification number of the material having the greatest aggregate gross weight. When two PIH materials have the same hazard zone and gross weight, either identification number marking may be used on the transport vehicle or freight container.

I hope this satisfies your request.

Sincerely,

John A. Gale
Transportation Regulations Specialists
Office of Hazardous Materials Standards



000360

172.313



BAH
§ 172.313 (c)(3)(i)
Marking
00-0360

ROBERT G. PETRANCOSTA
Director
Safety and Environmental Compliance

December 22, 2000

Mr. Edward Mazzullo, Director
Offices of Hazardous Materials Safety
Research & Special Programs Administration
U.S. Department of Transportation
400 Seventh Street, SW
Washington, DC 20590-0001

RE: MARKING REQUIREMENTS FOR PIH MATERIALS
REQUEST FOR WRITTEN INTERPRETATION

Dear Mr. Mazzullo:

As required under § 172.313(c)(3)(i), a transport vehicle containing different materials poisonous by inhalation in the same hazard zone, shall be marked with the identification number of the material having the greatest aggregate gross weight.

My question concerns a transport vehicle that contains two different materials poisonous by inhalation in the same hazard zone that have identical gross weight.

Example: A transport vehicle is loaded at one facility with 1,000 kg (2,205 pounds) Dichlorosilane, 2.3, UN 2189, Hazard Zone B, and, 1,000 kg (2,205 pounds) Acetone cyanohydrin, stabilized, 6.1, UN 1541, PG I, Hazard Zone B. Which material identification number would be required to be displayed?

Thank you in advance for responding to this inquiry.

Sincerely,

Robert Petrancosta

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